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Attorney for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., an individual,
LENTO LAW FIRM, LLC, a limited
liability company,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., an individual,
THE LAW OFFICE OF KEITH ALTMAN,
PLLC, a/k/a "K ALTMAN LAW", a limited
liability company, ARI KRESCH, an
individual, and RICHARD GILL, an
individual,

Defendants.

Civil Action No.: 1:22-cv-04840

Hon. Robert B. Kugler

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE
REPLY BRIEF**

COME NOW Defendants Keith Altman (“Altman”), Law Office of Keith Altman, PLLC (“KA Law”), Richard Gill (“Gill”) and Ari Kresh (“Kresh”) with their Motion for an Extension of Time to file Reply Brief.

1. On November 14, 2022, Defendants filed their Motion to Dismiss with the Court. (ECF 26 and 27).

2. Plaintiffs’ counsel sought concurrence from Defendants’ counsel on November 15, 2022, on an extension to reply to the motions. **(Exhibit A)**.

3. Defendants’ counsel ultimately agreed to an extension creating the following deadlines which extended Plaintiff’s time to file their Response Brief, in addition to an extended timeframe for Defendant to file their Reply Briefs. **(Exhibit A)**.

4. On November 16, 2022, Plaintiff filed their Motion for an Extension. (ECF 28).

5. On November 17, 2022, Defendant filed an Opposition to Plaintiff’s Motion due to the contents of Plaintiff’s motion not reflecting the concurrence between the parties. Namely, the additional time agreed to for Defendants’ Reply Brief.

6. An Order was issued on November 17, 2022, granting Plaintiff’s Motion for an Extension. (ECF 30).

7. Defendants seek an extension of time to file their Reply brief as concurred upon by the parties.

8. The parties agreed to a 14-day extension on the filing of the Reply Briefs.

9. Taking this Honorable Court's November 17, 2022, Order into account the Defendants seek a deadline of January 17, 2022 to file their Reply Brief to Defendants' Motions to Dismiss.

WHEREFORE, PREMISES CONSIDERED, Defendants request this honorable Court grant the Motion.

Dated: November 21, 2022

Respectfully submitted,

/s/ Solomon M. Radner

Solomon M. Radner, Esq. (283502018)

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Attorney for Defendants

SO ORDERED: *Tim O'Connell*

DATE: *11/22/2022*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., an individual,
LENTO LAW FIRM, LLC, a limited
liability company,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., an individual,
THE LAW OFFICE OF KEITH ALTMAN,
PLLC, a/k/a "K ALTMAN LAW", a limited
liability company, ARI KRESCH, an
individual, and RICHARD GILL, an
individual,

Defendants.

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CERTIFICATE OF SERVICE

The undersigned attorney for Defendants hereby certifies that a true and correct copy of the foregoing document has been electronically filed and is available for viewing and downloading from the ECF system in accordance with the local Federal Rules of Civil Procedure.

Dated: November 21, 2022

Respectfully submitted,

/s/ Solomon M. Radner

Solomon M. Radner, Esq. (283502018)

Exhibit A

From: Samuel Jackson
To: Lori Crusselle
Cc: Keith Altman; Solomon Radner; Solomon Radner, Esq.
Subject: RE: Lento v. Altman - Adjournment request
Date: Tuesday, November 15, 2022 6:41:27 PM
Attachments: image001.png

Thank you so much. Based on the wording of the rule, I will have to make a motion.
Sam

From: Lori Crusselle <loricrusselle@kaltmanlaw.com>
Sent: Tuesday, November 15, 2022 4:27 PM
To: Samuel Jackson <sdjackson@lentolawgroup.com>
Cc: Keith Altman <keithaltman@kaltmanlaw.com>; Solomon Radner <solomon@radnerlawgroup.com>; Solomon Radner, Esq. <solomonradner@kaltmanlaw.com>
Subject: RE: Lento v. Altman - Adjournment request

Mr. Jackson –

Mr. Altman will agree to the 30 day extension of time for Plaintiffs to respond to the Motions to Dismiss, making Plaintiffs' responses due on December 28, 2022, and that Defendants' replies are due January 19, 2023, subject to Court approval.

Please send us a stipulation or unopposed motion for this requested adjournment.

Thank you.



Lori Crusselle
Director of Litigation
Direct Phone: (470) 502-2567
Firm Phone: (248) 987-8929
<http://www.kaltmanlaw.com>

From:
Samuel
Jackson

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<sdjackson@lentolawgroup.com>
Sent: Tuesday, November 15, 2022 4:15 PM
To: Lori Crusselle <loricrusselle@kaltmanlaw.com>
Cc: Keith Altman <keithaltman@kaltmanlaw.com>; Solomon Radner <solomon@radnerlawgroup.com>; Solomon Radner, Esq. <solomonradner@kaltmanlaw.com>
Subject: RE: Lento v. Altman - Adjournment request

Dear Mr. Altman,

There are two lengthy motions pending (one is 44 pages, the other is 31 pages), each with a significant number of legal arguments to be addressed. We provided you with a 60-day extension to respond to the complaint, which allowed you time to draft these motions. I asked for an additional 30 days because that was the absolute minimum amount of time we need to properly respond to these motions. Unfortunately, the additional 7 days you offered will not be nearly enough time, especially given the approaching holiday. I am reiterating my original request for a 30-day extension, which I believe is customary and more than fair, given the situation.

Thank you,
Sam

From: Lori Crusselle <loricrusselle@kaltmanlaw.com>
Sent: Tuesday, November 15, 2022 3:58 PM
To: Samuel Jackson <sdjackson@lentolawgroup.com>
Cc: Keith Altman <keithaltman@kaltmanlaw.com>; Solomon Radner <solomon@radnerlawgroup.com>; Solomon Radner, Esq. <solomonradner@kaltmanlaw.com>
Subject: FW: Lento v. Altman - Adjournment request

Mr. Jackson –

Mr. Altman has asked me to respond on his behalf.

He is agreeable to the following enlarged briefing schedule:

Plaintiffs' responses to Defendants' Motions to Dismiss due on December 12, 2022;

Defendants' reply briefs would be due on December 23, 2022.

Please let us know if that is acceptable to you.

Thank you.



Lori Crusselle
Director of Litigation
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<sdjackson@lentolawgroup.com>

From:
Samuel
Jackson

Sent: Tuesday, November 15, 2022 11:42 AM

To: Keith Altman <keithaltman@kaltmanlaw.com>; Solomon Radner
<solomon@radnerlawgroup.com>

Subject: Lento v. Altman - Adjournment request

Good morning,

I have received both motions to dismiss. Would you consent to adjourn them 30 days?

Thank you,
Sam



Distinction. Devotion. Diligence.

Samuel D. Jackson, Esquire

Litigation Associate

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